

FILED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

AUG 16 2002

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

PAUL S. SYHONGPAN and
MARIA LOURDES BANEA

02 CR

02CR0801

Violations: Title 18, United States
Code, Sections 371 and 2.

DOCKETED

AUG 16 2002

JUDGE LINDBERG

MAGISTRATE SIDNEY I. SCHENKIER

The UNITED STATES ATTORNEY charges that:

1. At times material to this indictment, defendants PAUL S. SYHONGPAN and MARIA LOURDES BANEA both worked as regular clerks for the United States Postal Service.

2. From in or about November 1998 to on or about May 2001, at Arlington Heights, Palatine, Rolling Meadows, and elsewhere in the Northern District of Illinois, Eastern Division,

PAUL S. SYHONGPAN and
MARIA LOURDES BANEA,

defendants herein, combined, conspired, and agreed with each other to commit offenses against the United States, namely:

(a) to embezzle first-class letters that contained credit cards and had been mailed by credit card companies to individuals in Arlington Heights, Palatine, and elsewhere, which letters were entrusted to defendants SYHONGPAN and BANEA and came into their possession, intended to be conveyed by mail, in violation of Title 18, United States Code, Section 1709; and

(b) to use one or more unauthorized access devices, knowingly and with intent to defraud, during any one-year period, and to obtain by such conduct items of value aggregating

\$1,000 or more during that period, in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

3. It was part of the conspiracy that from in or about November 1998 through in or about May 2001, defendant PAUL S. SYHONGPAN, as part of his work as a regular clerk at the Arlington Heights Post Office branch, and defendant MARIA LOURDES BANEAL, as part of her work as a regular clerk at the Palatine Post Office branch, came into possession of letters that he or she knew contained credit cards, and that were supposed to be delivered to the intended recipient. Many of these letters with credit cards were "on hold" at the Arlington Heights or Palatine Post Office branch or were to be forwarded from such branch to a different Post Office branch. While working at the Post Office, SYHONGPAN and BANEAL stole in excess of 15 such letters and credit cards.

4. It was further part of the conspiracy that defendants PAUL S. SYHONGPAN and MARIA LOURDES BANEAL used these stolen credit cards to purchase items for themselves, including major home appliances, electronic and stereo equipment, video games, clothes, and gift certificates and gift cards, totaling at least \$70,094.00.

5. It was further part of the conspiracy that defendants PAUL S. SYHONGPAN and MARIA LOURDES BANEAL hid, concealed, and caused to be hidden and concealed the acts and objects of the conspiracy.

OVERT ACTS

6. In furtherance of the conspiracy, and to effect the unlawful objects of the conspiracy, defendants PAUL S. SYHONGPAN and MARIA LOURDES BANEAL committed the following overt acts, among others, in the Northern District of Illinois, Eastern Division:

(a) On or about April 11, 2000, defendant PAUL S. SYHONGPAN, being a United States Postal Service employee, did steal and remove a First Class letter addressed to Individual A,

an Arlington Heights resident, containing a VISA credit card issued by First USA Bank, which had been entrusted to him and had come into his possession and intended to be conveyed by mail.

(b) From on or about April 11, 2000, through on or about April 25, 2000, defendants PAUL S. SYHONGPAN and MARIA LOURDES BANEA used this stolen Visa credit card to buy items of value, including gift cards and gift certificates, clothing and cologne, totaling \$15,095.19.

(c) On or about August 20, 2000, defendant MARIA LOURDES BANEA, being a United States Postal Service employee, did steal and remove a First Class letter addressed to Individual B, a Mount Prospect resident, containing a VISA credit card issued by First USA Bank, which had been entrusted to her and had come into her possession and intended to be conveyed by mail.

(d) From on or about August 20, 2000, through on or about August 24, 2000, defendants PAUL S. SYHONGPAN and MARIA LOURDES BANEA used the stolen Visa credit card to buy items of value, including a Weber grill and gift certificates, totaling \$3,090.20.

(e) On or about April 1, 2001, defendant PAUL S. SYHONGPAN, being a United States Postal Service employee, did steal and remove a First Class letter addressed to Individual C, an Arlington Heights resident, containing a MASTERCARD credit card issued by Sears National Bank, which had been entrusted to him and had come into his possession and intended to be conveyed by mail.

(f) From on or about April 1, 2001, through on or about April 6, 2001, defendants PAUL S. SYHONGPAN and MARIA LOURDES BANEA used the stolen MASTERCARD credit card to buy items of value, including a gas stove, a dishwasher, a microwave, a SONY PLAYSTATION 2, gift cards and gift certificates, totaling \$11,277.80;

In violation of Title 18, United States Code, Sections 371 and 2.

Patricia J. Fitzgerald

UNITED STATES ATTORNEY